

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

NORMAN WILLOX,

Plaintiff,

v.

MICHAEL LADAS, MID ATLANTIC
MARINE GROUP, LLC, and EPIC
YACHTING, LLC,

Defendants.

Case No. 1:13-cv-02096

JOINT MOTION TO CONTINUE SCHEDULING ORDER DEADLINES

Plaintiff Norman Willox ("Willox") and Defendants Michael Ladas, Mid Atlantic Marine Group, LLC, and Epic Yachting, LLC, move the Court for a 60-day continuance of the dates remaining in the Scheduling Order that was issued on December 30, 2013. In support of this motion, the parties state the following:

1. This is a dispute concerning Plaintiff's investment into Defendant Mid Atlantic Marine Group, LLC ("MAMG"). Plaintiff filed a Complaint alleging several claims against Defendants in relation to this investment. Defendant Ladas filed a Counterclaim alleging breaches of the same agreement.

2. This is the parties' second request for an extension of the outstanding deadlines. The parties have been diligently working on discovery in this case, including conducting meet and confer conferences to resolve a number of disputes without involving the Court.

3. The parties have engaged in settlement discussions in this case and intend on mediating this case in the near future. The parties have attempted to schedule mediation as soon

as possible. However, due to scheduling conflicts between the parties and the mediator, additional time is necessary for mediation, and the parties believe additional time would allow them an opportunity to resolve the issues between them without need for further litigation.

4. Also, the parties have begun taking depositions in this case. However, there still remain several witnesses who need to be deposed.

5. Because some of the witnesses reside outside of Maryland, it has taken the parties considerably longer to depose those witnesses.

6. The Court's December 30, 2013 Scheduling Order provides the following remaining deadlines:

March 11, 2014	Discovery deadline; submission of status report
March 18, 2014	Requests for admission
April 15, 2014	Dispositive pretrial motions deadline

7. In light of the parties' efforts towards mediating and resolving this case, the several depositions that need to be conducted, and logistical challenges of working with witnesses to schedule their depositions, the parties jointly request a 60-day continuance of the remaining discovery and motion filing deadlines in this case.

8. A revised Scheduling Order for the remaining deadlines would be as follows:

May 12, 2014	Discovery deadline; submission of status report
May 19, 2014	Requests for admission
June 16, 2014	Dispositive pretrial motions deadline

WHEREFORE, the parties request that the Court extend by 60 days the deadlines for discovery, requests for admission, and dispositive pretrial motions.

February 3, 2014

Respectfully submitted,

/s/

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